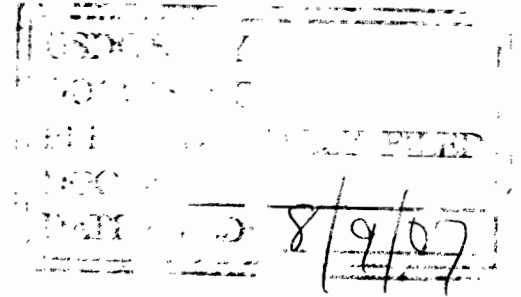


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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
GINA SOCKOLOW,

Plaintiff,

vs.

THE BUCKINGHAM RESEARCH GROUP
INCORPORATED,

Defendant.
----- X

SCHEDULING ORDER

Index No. 07 CIV 6120 (SAS) (ECF)
Conference Date: August 8, 2007

WHEREAS, the Court issued an Order for a Conference in accordance with Fed. R. Civ. P. 16(b) on July 11, 2007 (the "Order"); and

WHEREAS, the Order requires that the parties jointly prepare and sign a proposed scheduling order containing certain information;

NOW, THEREFORE, the parties submit the following information as required by the Order:

1. Pursuant to Fed. R. Civ. P. 26(f), the parties conferred regarding discovery on August 2, 2007.

2. Plaintiff claims that she was discriminated against because of her gender and complains that she was not paid certain amounts that she contends were due to her. Defendant denies all of plaintiff's allegations and further asserts that some of plaintiff's claims are subject to an arbitration agreement and must be arbitrated.

3. Discovery Schedule. The parties jointly propose to the Court the following discovery plan:

- a. Pre-Discovery Disclosures. The parties will exchange the information required by Fed. R. Civ. P. 26(a)(1) on or before August 22, 2007.
- b. The subjects on which discovery shall be had are those embodied in the pleadings.
- c. The parties will serve document requests and interrogatories by September 1, 2007. Document requests will be served in accordance with the Federal Rules of Civil Procedure. Responses to document requests will be due by October 1, 2007.
- d. Interrogatories will be served by each party in accordance with the Federal Rules of Civil Procedure and Local Rule 33.3. Responses to interrogatories will be due 30 days after service, unless the parties agree to extend the time in which to respond. The parties will otherwise comply with all Federal and Local Rules applicable to interrogatories.
- e. A maximum of 10 depositions will be conducted by Plaintiff and 10 by Defendants, exclusive of experts. Each deposition will be limited to a maximum of 7 hours, unless extended by agreement of parties. At the present time, the following persons will be deposed: Gina Sockolow, Manny Korman, Mark Gronet, Lloyd Karp, Andrew Sinclair, David Keidan, and Glenn Redemann. All depositions must take place between October 15, 2007 and January 31, 2008. The parties reserve their rights to move for a protective order and/or object to any proposed deponents.
- f. If the parties determine that experts are needed, which they do not currently anticipate, they will propose an expert discovery schedule on or before December

31, 2007, and any expert discovery would extend the proposed discovery schedule solely for purposes of expert discovery.

- g. Supplementations under Rule 26(e) will be due on a continuing basis, when appropriate.
- h. Discovery will be completed by January 31, 2008, unless the parties otherwise agree upon an extension and such extension is approved by the Court.
- i. Plaintiff will supply its pre-trial order matters to Defendant by February 28, 2008, unless this Court grants Defendant's request to move for summary judgment, in which case Plaintiff will supply such matters within 30 days of any decision on such motion for summary judgment, if the motion is denied.
- j. The parties will submit a pre-trial order in a form conforming with the Court's instructions together with trial briefs and proposed voir dire questions and proposed jury instructions within 30 days of Plaintiff's provision of pre-trial order matters, pursuant to sub-section (i) above, unless such date is extended by this Court.
- k. A final pre-trial conference pursuant to Fed. R. Civ. P. 16(d) will take place on Feb 12 at 4³⁰ [left intentionally blank as required by Court]

4. The parties do not currently anticipate placing any limitations on discovery, including any protective or confidentiality orders, except to the extent outlined in paragraph 3 above.

- 5. The parties do not currently anticipate any issues in discovery.
- 6. Dispositive motions, if any, shall be filed by February 28, 2008.

7. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due from both parties 30 days prior to trial.

8. The parties should have 20 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

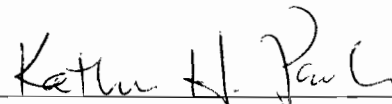
9. The case should be ready for trial by May 1, 2008, assuming no expert discovery and that no dispositive motions are filed, ~~or 60 days following a ruling on any dispositive motion~~. At this time, trial is expected to take approximately one week and is expected to be before a jury.

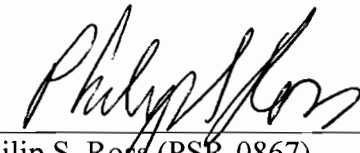
10. This Scheduling Order may be altered or amended only on a showing of good cause not foreseeable at the time of the conference or when justice so requires.

SO ORDERED:


SHIRA A. SCHEINDLIN
U.S.D.J.

Dated: New York, New York
August 7, 2007


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